



ORGANIZATION FOR THE PROTECTION
AND ADVANCEMENT OF SMALL
TELEPHONE COMPANIES

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December 19, 1994

Mr. William F. Caton
Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Allocation of Spectrum Below 5 GHz
Transferred from Federal Government
Use
ET Docket No. 94-32

Dear Mr. Caton:

Please find enclosed for filing the original and eleven copies of the Organization for the Protection and Advancement of Small Telephone Companies' comments in the above-captioned proceeding.

Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lisa M. Zaina', with a long horizontal line extending to the right.

Lisa M. Zaina
General Counsel

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

In the Matter of)

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COMMENTS OF
**THE ORGANIZATION FOR THE PROTECTION AND
ADVANCEMENT OF SMALL TELEPHONE COMPANIES**

OPASTCO
21 Dupont Circle, NW
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(202) 659-5990

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COMMENTS OF THE
ORGANIZATION FOR THE PROTECTION AND ADVANCEMENT OF
SMALL TELEPHONE COMPANIES

The Federal Communications Commission (FCC or Commission) has proposed allocations for the 50 MHz of spectrum that was identified by the Department of Commerce for transfer from Federal Government to private sector use.¹ The Commission believes that the allocations will benefit the public by providing for the introduction of new services and the enhancement of existing services. Further, the FCC believes that these new and enhanced services will create new jobs, foster economic growth and improve access to communications by the industry and the American public. The Organization for the Protection and Advancement of Small Telephone Companies (OPASTCO) hereby submits its comments in response to the Commission's proposals.

OPASTCO is a national trade association of more than 400 independently owned and operated telephone companies serving

¹In the Matter of Allocation of Spectrum Below 5 GHz Transferred from Federal Government Use, ET Docket No. 94-32, Notice of Proposed Rulemaking, released November 8, 1994. ("Notice")

rural areas of the United States and Canada. Its members, which include both commercial companies and cooperatives, together serve over two million customers. OPASTCO believes that appropriate allocation of these frequencies could aid the FCC in its quest to benefit the public through the introduction of new and enhanced applications in rural areas.

OPASTCO supports Southwestern Bell's proposal to pair the 2390-2400 MHz band with the 2300-2310 MHz band and use it for wireless local loop service.² Thus, the local exchange carrier (LEC) would be able to provide telecommunications service to its customers via radio links as opposed to over copper wire or fiber optics. This application would enable the LEC to reach more customers, provide more services, and further develop the rural infrastructure.

The pairing of the 2390-2400 MHz band with the 2300-2310 MHz band and allocation of it for wireless local loops is particularly important for rural America. Small, rural telephone companies typically serve large geographic areas with low population density over difficult terrain. Thus, the use of wireless loops can enable these companies to reach more customers. Additionally, it is often more economical to use wireless facilities to provide access to these hard-to-reach customers. The initial costs of building the system and the maintenance of wireless loops are less than those associated with buried plant in some cases. Giving LECs the opportunity to use this spectrum in this manner will "ensure that the spectrum is

²Comments of Southwestern Bell filed June 15, 1994.

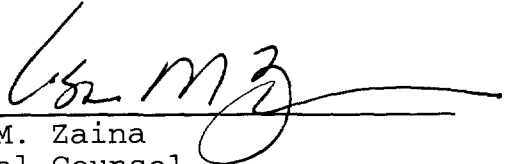
used for services that are most highly valued by the public."³
Clearly, provision of services that encompass the most basic telecommunications services are very highly valued by the public.

The LEC industry has already shown the value of radio-based technology for the provision of basic local exchange services to rural customers. Through Basic Exchange Telecommunications Radio Service (BETRS), the LECs have shown that this application of radio technology is cost-effective and efficient. Unfortunately, some limitations placed on BETRS have made it somewhat inadequate for the provision of fixed services. Thus, the allocation of the frequencies for wireless local loops would not be redundant, but would supplement a current application of wireless technology in the provision of telecommunications services.

OPASTCO urges the Commission to adopt Southwestern Bell's proposal to pair the 2390-2400 MHz band with the 2300-2310 MHz band and use it for wireless local loop. It will be an application that will be highly valued by the public and have the greatest positive impact for consumers.

Respectfully submitted,

**THE ORGANIZATION FOR THE
PROTECTION AND ADVANCEMENT
OF SMALL TELEPHONE COMPANIES**

By: 
Lisa M. Zaina
General Counsel

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December 19, 1994

³Notice at paragraph 11.